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Lead Counsel for Direct Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

This Document Relates to:

ALL DIRECT PURCHASER ACTIONS

**DECLARATION OF R. ALEXANDER
SAVERI IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS' APPLICATION
FOR DEFAULT JUDGMENT BY THE
COURT AGAINST THE IRICO
DEFENDANTS**

Date: September 12, 2017
Time: 2:00 p.m.
Judge: Honorable Jon S. Tigar
Courtroom: 9

REDACTED VERSION OF DOCUMENT
SOUGHT TO BE SEALED

1 I, R. Alexander Saveri, declare:

2 1. I am the Managing Partner of Saveri & Saveri, Inc., Lead Counsel for Direct
3 Purchaser Plaintiffs ("Plaintiffs") in this action. I am a member of the Bar of the State of California
4 and admitted to practice in the Northern District of California. I make this Declaration in Support
5 of Plaintiffs' Application for Default Judgment by the Court Against the Irico Defendants. Except
6 as otherwise stated, I have personal knowledge of the facts stated below.

7 2. On September 1, 2016, Leslie M. Marx, Ph.D., completed her expert report on
8 behalf of Plaintiffs in anticipation of trial against the Mitsubishi Electric Defendants. Attached
9 hereto as Exhibit A is a true and correct copy of Dr. Marx's report.

10 3. This multidistrict litigation arises from an alleged worldwide conspiracy to fix
11 prices of Cathode Ray Tubes ("CRTs"). CRTs are the primary components of CRT televisions and
12 computer monitors. The complaint alleged a conspiracy involving some of the largest companies in
13 the world, including Chunghwa, Hitachi, LG Electronics, Mitsubishi Electric, Panasonic, Philips,
14 Samsung SDI, Thomson, Toshiba and the Irico Defendants.

15 4. After the United States Department of Justice ("DOJ") announced its investigation
16 into the conspiracy in November 2007, twenty direct purchaser plaintiff class action complaints
17 were filed alleging a violation of Section 1 of the Sherman Act, 15 U.S.C. § 1, and Section 4 of the
18 Clayton Act, 15 U.S.C. § 15.

19 5. In the *In re Monosodium Glutamate Antitrust Litigation* (D. Minn.), the Court
20 entered default judgment against Defendant Tung Hai Fermentation Industrial Corporation n/k/a
21 Vedan Enterprises Group in the amount of \$184,700,000 on motion of direct purchaser plaintiffs
22 for whom I served as counsel. Attached hereto as Exhibit B is a true and correct copy of the court's
23 order entering default judgment, ECF No. 486, dated September 10, 2004. Attached hereto as
24 Exhibit C is a true and correct copy of the court's order entering default judgment and awarding
25 post-judgment interest on the 2004 judgment, ECF No. 613, dated August 4, 2016.

26 6. On November 6, 2014, Jeffrey J. Leitzinger, Ph.D., completed his expert report on
27 behalf of Plaintiffs, which was used in support of Plaintiffs' motion for class certification. Attached
28 hereto as Exhibit D is a true and correct copy of Dr. Leitzinger's class certification report.

1 7. On September 1, 2016, Jeffrey J. Leitzinger, Ph.D., completed his expert report on
2 behalf of Plaintiffs in anticipation of trial against the Mitsubishi Electric Defendants. Attached
3 hereto as Exhibit E is a true and correct copy of Dr. Leitzinger's report.

4 8. On September 1, 2016, Dr. Leitzinger's final study was transmitted to the
5 Mitsubishi Electric Defendants.

6 9. I understand from attorneys working under my direction that the documentary
7 evidence shows that representatives of the Irico Defendants attended at least [REDACTED]
8 [REDACTED].

9 10. Attached hereto as Exhibit F is a true and correct copy of a document produced in
10 this litigation bearing the Bates stamp CHU00030679-83. It was marked as Deposition Exhibit No.
11 1312.

12 11. Attached hereto as Exhibit G is a true and correct copy of a document produced in
13 this litigation bearing the Bates stamp CHU000030688-91. It was marked as Deposition Exhibit
14 No. 1303.

15 12. Attached hereto as Exhibit H is a true and correct copy of a document produced in
16 this litigation bearing the Bates stamp CHU00030695-97. It was marked as Deposition Exhibit No.
17 1301.

18 13. Attached hereto as Exhibit I is a true and correct copy of a document produced in
19 this litigation bearing the Bates stamp CHU00030819-33. It was marked as Deposition Exhibit No.
20 1305.

21 14. Attached hereto as Exhibit J is a true and correct copy of a document produced in
22 this litigation bearing the Bates stamp CHU0029110-15. It was marked as Deposition Exhibit No.
23 2260.

24 15. Attached hereto as Exhibit K is a true and correct copy of a document produced in
25 this litigation bearing the Bates stamp SDCRT-0087694.

26 16. Attached hereto as Exhibit L is a true and correct copy of a document produced in
27 this litigation bearing the Bates stamp SDCRT-0087700-02.

28 17. Attached hereto as Exhibit M is a true and correct copy of a document produced in

1 this litigation bearing the Bates stamp CHU00030067.

2 18. Attached hereto as Exhibit N is a true and correct copy of a document produced in
3 this litigation bearing the Bates stamp CHU00123358-61. It was marked as Deposition Exhibit No.
4 1267.

5 19. Attached hereto as Exhibit O is a true and correct copy of a document produced in
6 this litigation bearing the Bates stamp SDCRT-0091524-30.

7 20. Attached hereto as Exhibit P is a true and correct copy of a document produced in
8 this litigation bearing the Bates stamp CHU00102752-54.

9 I declare under the penalty of perjury under the laws of the United States of America that
10 the foregoing is true and correct.

11 Executed this 3rd day of August, 2017 in San Francisco, California.

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13 /s/ R. Alexander Saveri
14 R. Alexander Saveri
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